

EXHIBIT G

Amanda L. Groves (SBN: 187216)
agroves@winston.com
Morgan E. Stewart (SBN: 321611)
mstewart@winston.com
WINSTON & STRAWN LLP
101 California Street, 35th Floor
San Francisco, CA 94111-5802
Telephone: (415) 591-1000
Facsimile: (415) 591-1400

Kobi K. Brinson (Admitted *pro hac vice*)
kbrinson@winston.com
Stacie C. Knight (Admitted *pro hac vice*)
sknight@winston.com
WINSTON & STRAWN LLP
100 North Tryon Street
Charlotte, NC 28202-1078
Telephone: (704) 350-7700
Facsimile: (704) 350-7800

Attorneys for Defendant
WELLS FARGO BANK, N.A.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ALICIA HERNANDEZ, EMMA WHITE,
KEITH LINDNER, TROY FRYE,
COSZETTA TEAGUE, IESHA BROWN,
RUSSELL and BRENDA SIMONEAUX,
JOHN and YVONNE DEMARTINO,
ROSE WILSON, TIFFANIE HOOD,
GEORGE and CYNDI FLOYD, and
DIANA TREVINO, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

WELLS FARGO & COMPANY,
WELLS FARGO BANK, N.A.

Defendants.

Case No. No. 18-cv-07354-WHA

**DEFENDANT WELLS FARGO BANK, N.A.'S
RESPONSES TO PLAINTIFFS' FIRST SET
OF REQUEST FOR ADMISSION**

PROPOUNDING PARTY: PLAINTIFFS

RESPONDING PARTY: DEFENDANT WELLS FARGO BANK, N.A.

SET NUMBER: ONE (1)

Pursuant to Federal Rules of Civil Procedure 26 and 33, Defendant Wells Fargo Bank, N.A. (“Defendant”) hereby objects and responds to Plaintiff Alicia Hernandez’s (“Plaintiff”) First Set of Request for Admission. Defendant reserves the right to supplement, modify, or amend these responses up to and through the time of trial.

PRELIMINARY STATEMENT

The following responses (“Responses”) and objections (“Objections”) to Plaintiff’s Requests are based upon Defendant’s knowledge, information, and belief at this time. Defendant has made a reasonable and good faith effort to respond. However, Defendant has not fully completed its investigation relating to the facts in this action, has not fully completed discovery in this action, and has not completed preparation for trial. The responses contained herein are based only on such information and documents which are presently available and specifically known to Defendant, and disclose only those contentions which presently occur to Defendant. It is anticipated that further discovery, independent investigation, legal research and analysis will supply additional facts and meaning to the known facts as well as establish entirely new factual conclusions and legal conclusions, all of which may lead to substantial additions to, and variations in, the contentions set forth herein. Defendant specifically reserves the right to amend these responses should additional information become available and to use such information.

No incidental or implied admissions are intended in this response. The fact that Defendant has responded to the Requests should not be taken as an admission that Defendant accepts or admits the existence of any facts set forth or assumed by the Requests or that such response constitutes admissible evidence. The fact that Defendant has responded to the Requests is not intended to and shall not be construed to be a waiver by Defendant of all or any part of any objection to the Requests.

These introductory paragraphs shall apply to the responses given herein and shall be incorporated by this reference as though fully set forth in each of the following responses. Defendant

1 makes this response to the Requests solely for the purpose of this action. The response is subject to
 2 all objections as to competence, relevance, materiality, propriety, admissibility, privilege, privacy
 3 and the like, and any and all other objections on grounds that would require the exclusion of the
 4 response herein if such were offered in court, all of which objections and grounds are reserved and
 5 may be interposed at the time of trial.

6 7 **RESPONSES & OBJECTIONS**

8 **REQUEST FOR ADMISSION NO. 1:**

9 Admit that each proposed class member (as defined in paragraph 158 of the second amended
 10 complaint, Dkt. 137) had a security instrument with an acceleration clause that included the “action
 11 required to cure the default” or “except as limited by regulations issued by the [HUD] Secretary”
 12 phrase.

13 **RESPONSE TO REQUEST NO. 1:**

14 Defendant objects on the ground that the Request is overbroad and premature as to any
 15 individuals other than the named Plaintiffs, as no class has yet been certified. Defendant further
 16 objects on the ground that the Request is unduly burdensome.

17 Subject to and without waiving these objections, Defendant responds as follows: Admitted as
 18 to the named Plaintiffs, only.

19
20
21
22 Dated: December 6, 2019

WINSTON & STRAWN LLP

23
24 By: /s/ Amanda L. Groves
 Amanda L. Groves
 Kobi K. Brinson (*pro hac vice*)

25
26 Attorneys for Defendant
 WELLS FARGO BANK, N.A.

CERTIFICATE OF SERVICE

United States District Court for the Northern District of California

Case No. 3:18-cv-07354-WHA

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Winston & Strawn LLP, 333 S. Grand Avenue, Los Angeles, CA 90071-1543. On December 6, 2019, I served the following document:

DEFENDANT WELLS FARGO BANK, N.A.'S RESPONSES TO PLAINTIFF'S FIRST SET OF REQUEST FOR ADMISSION



by placing a copy of the document listed above in a sealed envelope with postage thereon fully prepaid in the United States mail at Los Angeles, CA addressed as set forth below.

I am readily familiar with the firm's business practice for collection and processing of correspondence for mailing with the United States Postal Service. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service with postage fully prepaid.



by electronically transmitting a copy of the document listed above via email to the addressees as set forth below, in accordance with the parties' agreement to be served electronically pursuant to Federal Rule of Civil Procedure 5(b)(2)(E), or Local Rule of Court, or court order. No error messages were received after said transmission.

RICHARD M. PAUL, III
PAUL LLP
601 WALNUT STREET, SUITE 300
KANSAS CITY, MO 64106
816-984-8103
FAX: 816-984-8101
EMAIL: rick@paulllp.com

ASHLEA GAYLE SCHWARZ
PAUL LLP
601 WALNUT STREET, SUITE 300
KANSAS CITY, MO 64106
816-984-8100
FAX: 816-984-8101
EMAIL: ashlea@paulllp.com

MICHAEL LAWRENCE SCHRAG
GIBBS LAW GROUP LLP
505 14TH STREET, SUITE 1110
OAKLAND, CA 94612
510-350-9700
FAX: 510-350-9701
EMAIL: mls@classlawgroup.com

1 I declare under penalty of perjury under the laws of the United States of America that the
2 above is true and correct.

3
4 Signed: Shawn R. Obi
Shawn R. Obi

5
6 Dated: December 6, 2019
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28